

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HUAWEI TECHNOLOGIES CO., LTD.; )  
HUAWEI DEVICE CO., LTD.; and HUAWEI )  
DEVICE (SHENZHEN) CO., LTD., )  
Plaintiffs, ) Civil Action No. 1:24-cv-04708  
)  
v. ) So ordered.  
)  
PANOPTIS PATENT MANAGEMENT, LLC, )  
Defendant. ) /s/ Alvin K. Hellerstein, U.S.D.J.  
\_\_\_\_\_) 8/8/25  
\_\_\_\_\_  
PANOPTIS PATENT MANAGEMENT, LLC; )  
PANOPTIS EQUITY HOLDINGS, LLC; )  
OPTIS WIRELESS TECHNOLOGY, LLC; )  
OPTIS CELLULAR TECHNOLOGY, LLC; )  
and UNWIRED PLANET INTERNATIONAL )  
LIMITED, )  
Counterclaim-Plaintiffs, )  
v. )  
HUAWEI TECHNOLOGIES CO., LTD.; )  
HUAWEI DEVICE CO., LTD.; and HUAWEI )  
DEVICE (SHENZHEN) CO., LTD., )  
Counterclaim-Defendants. )

**DEFENDANT'S AND COUNTERCLAIM PLAINTIFFS' NOTICE OF MOTION FOR  
LEAVE TO (I) FILE UNDER SEAL THEIR UNREDACTED REPLY IN SUPPORT OF  
THEIR MOTION TO DISMISS AND EXHIBIT N TO THE DECLARATION OF  
JOSHUA A. WHITEHILL AND (II) PUBLICLY FILE THEIR REDACTED REPLY IN  
SUPPORT OF THEIR MOTION TO DISMISS AND EXHIBIT N TO THE  
DECLARATION OF JOSHUA A. WHITEHILL**

PLEASE TAKE NOTICE that Defendant and Counterclaim-Plaintiff PanOptis Patent Management, LLC and Counterclaim-Plaintiffs PanOptis Equity Holdings, LLC, Optis Wireless

Technology, LLC, Optis Cellular Technology, LLC, and Unwired Planet International Limited, by and through their undersigned counsel, and upon the accompanying Memorandum of Law in Support and Declaration of Ian G. DiBernardo and the exhibits thereto, hereby move this Court, before the Honorable Alvin K. Hellerstein, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, NY, for an order granting them leave to: (i) file under seal an unredacted Reply in Support of Their Motion to Dismiss and Exhibit N to the Declaration of Joshua A. Whitehill and (ii) file publicly a redacted Reply in Support of Their Motion to Dismiss and Exhibit N to the Declaration of Joshua A. Whitehill.

Date: August 7, 2025

Respectfully submitted,

By: /s/ Ian G. DiBernardo

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